

### III. REMARKS

1. Claims 1-22 remain in the application. Claims 1, 2, 8, 10-12, 14, 18, 20, and 21 have been amended. Claims 23-25 are new.

Support for the amendment may be found in the specification, for example, on page 13, line 31 through page 14, line 24, page 16, line 34 through page 17, line 22, and page 18, line 29 through page 20, line 5.

2. Applicants respectfully submit that claims 1-22 are patentable over the combination of Bloebaum et al. (US 6,433,735, "Bloebaum") in view of Krasner (US 6,133,874,) under 35 USC 103(a).

The combination of Bloebaum and Krasner fails to disclose or suggest transmitting position data about more than one of the reference points located in the vicinity of the wireless communication device, to the device, and using the transmitted data to calculate a default position of the device, and to estimate a pseudorange between the device and a satellite of a positioning system, as recited by the independent claims.

Neither Bloebaum nor Krasner disclose these features. Column 5, line 53 through column 6, line 8 of Bloebaum describes using a position entry of a radio network cell to calculate a current position estimate. However, there is nothing in Bloebaum related to transmitting position data about more than one reference point, and using data of more than one reference point to calculate a default position and a pseudorange. Krasner is also silent with respect to these features. At least for these reasons, claims 1-22 are patentable over the combination of Bloebaum and Krasner.

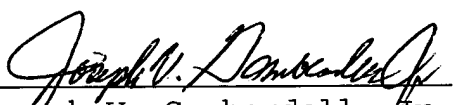
Claims 23-25 are new and are directed to calculating the default position from a geometric midpoint of the reference points, and from the reference points and a direction of movements of the device, and determining positions of the reference points from base station antenna patterns. The cited combination fails to disclose these features.

For all of the foregoing reasons, it is respectfully submitted that all of the claims now present in the application are clearly novel and patentable over the prior art of record, and are in proper form for allowance. Accordingly, favorable reconsideration and allowance is respectfully requested. Should any unresolved issues remain, the Examiner is invited to call Applicants' attorney at the telephone number indicated below.

A check in the amount of \$270.00 is enclosed for a one (1) month extension of time and on account of the additional claim fees.

The Commissioner is hereby authorized to charge payment for any fees associated with this communication or credit any over payment to Deposit Account No. 16-1350.

Respectfully submitted,

  
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1 June 2006  
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I hereby certify that this correspondence is being deposited with the United States Postal Service on the date indicated below as first class mail in an envelope addressed to the Commissioner of Patents, P.O. Box 1450, Alexandria VA 22313-1450.

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